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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
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16 JANET S. ROSE and DAVID M. ROSE,
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19 Plaintiffs,
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21 vs.
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23 NOVARTIS, f/k/a CHIRON
24 CORPORATION, f/k/a CETUS
25 CORPORATION, ABDALLAH FANIDI, an
26 individual, and DOES 1 through 100,
27 inclusive,
28

Defendants.

Case No.: CV 10-4200 TEH

STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
INITIAL DISCLOSURES

Current Date: January 10, 2011

Current Time: 1:30 p.m.

Current Dept.: 15

Judge: Thelton E. Henderson

21 Due to the pending Motion to Remand, set for hearing on January 24, 2011, the parties
22 hereto, by and through their counsel of record, HEREBY STIPULATE:

- 23 1. That the Case Management Conference, currently set for January 10, 2011 be
24 continued to a date at least 14 days after the ruling on the pending motion for
25 remand; and,
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2. That the date for the Initial Disclosures be continued to, and including, fourteen days after notice to the parties of the Court's ruling on the motion for remand.

Dated: January 3, 2011

FARRISE FIRM, P.C.

By: CARLA V. MINNARD
Attorneys for Plaintiffs

Dated: January 4, 2011

By: [Signature]
Michael Burns, Esq.
Peter Urias, Esq.
Attorneys for Defendants
NOVARTIS VACCINES AND
DIAGNOSTICS, INC. and
ABDALLAH FANIDI



PROOF OF SERVICE

I am employed in the County of Contra Costa, State of California. I am over the age of 18 and not a party to the within entitled action; my business address is 1850 Mt. Diablo Blvd., Suite 610, Walnut Creek, California 94596.

On the date listed below, I served the foregoing document(s) described as:

**STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE AND
INITIAL DISCLOSURES**

on the interested parties in this action by placing a copy thereof enclosed in a sealed envelope addressed as follows:

Michael Burns, Esq.
Sefarth Shaw, LLP
560 Mission Street, Suite 3100
San Francisco, CA 94105
Telephone: (415) 397-2823
Facsimile: (415) 397-8549

☐ **BY PERSONAL DELIVERY.** I delivered such envelope by hand to the offices of the addressee.

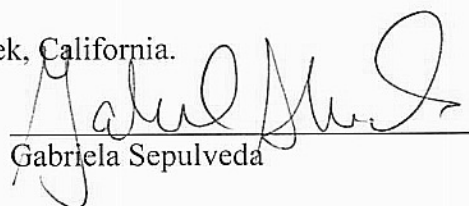
☒ **BY MAIL.** I caused such envelope with postage thereon fully prepaid to be placed in the U.S. Mail at Walnut Creek, California. I am familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Walnut Creek, California, in the ordinary course of business.

☐ **BY FACSIMILE TRANSMISSION.** I caused such document to be transmitted to the addressee(s) facsimile number(s) noted herein. The facsimile machine used complies with Rule 2003 and no error was reported by the machine.

☐ **BY FEDERAL EXPRESS.** I caused such envelope to be deposited with the Federal Express delivery service, with delivery charges thereon fully prepaid at Walnut Creek, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 4, 2011 at Walnut Creek, California.


Gabriela Sepulveda